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January 10, 2001

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JAN 10 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

HAND DELIVERED

Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3C 252 - Portals II
445 12th Street
Washington, D.C. 20554

94-1021

**Re: Centennial Puerto Rico License Corp. (KNLF250)
November 9, 2000 E911 Phase II Carrier Implementation Report**

Dear Mr. Sugrue:

This letter responds to your letter dated December 27, 2000 (copy enclosed) regarding Centennial Puerto Rico License Corp.'s E911 Phase II Carrier Implementation Report.

By telephone conversation with Cathleen Schultz of this office on January 9, 2001, Wendy Austrie confirmed Centennial that filed the report on November 9, 2000 in accordance with the September 14, 2000 *Public Notice*. Attached is a copy of the filing as stamped "received" by the Commission on November 9, 2000.

Should there be any further questions regarding this matter, please contact the undersigned counsel.

Sincerely,

James F. Ireland (by eac)
James F. Ireland

Enclosures
cc: (w/encl.): Wendy Austrie

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JAN 10 2001
FEDERAL ORGANIZATIONS DIVISION
OFFICE OF THE SECRETARY

KNLF250
Cole, Raywid & Braverman, LLP
1919 Pennsylvania Avenue, NW, Second Floor
WASHINGTON, DC 20006

By the Wireless Telecommunications Bureau:

1. Pursuant to section 20.3(h) of the Federal Communications Commission's (Commission) rules, wireless carriers were required to submit reports on or before November 9, 2000 to the Commission on their plans for implementation of wireless Enhanced 911 (E911) Phase II automatic location identification (ALI) systems.¹ As of the date of this notice, Centennial Puerto Rico License Corp. has failed to submit the required report.
2. In accordance with Section 308(b) of the Communications Act of 1934 as amended, 47 U.S.C. § 308(b), Centennial Puerto Rico License Corp., shall within fifteen (15) days of the date of this letter submit a report on its wireless E911 Phase II ALI implementation. _____
3. The report shall contain information on Centennial Puerto Rico License Corp.'s implementation plans, as outlined in the *Public Notice*, released September 14, 2000, Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification.² A copy of the *Public Notice* is attached hereto.
4. Failure to file a report concerning Centennial Puerto Rico License Corp.'s implementation plan for wireless E911 Phase II ALI systems constitutes a violation of the Commission's Rules. Failure to comply with this notice constitutes a continuing violation of the Commission's Rules and will be referred to the Commission's Enforcement Bureau and could result in administrative penalties, including monetary forfeiture. See *Forfeiture Policy Statement*, 12 FCC Red 17087 (1997).
5. Your report can be filed either electronically or as a paper filing. Electronic filings should be made using the Electronic Comment Filing System (ECFS). Reports filed through the ECFS can be sent as an electronic file via the Internet to <http://www.fcc.gov/e-file/ecfs.html>. In completing the transmittal screen, parties should include their full name, Postal Service mailing address, and the docket number of this proceeding. Parties filing electronically should also e-mail a copy of their report to

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Third Report and Order*, 14 FCC Rcd 17388 (1999)(*E911 Third Report and Order*).

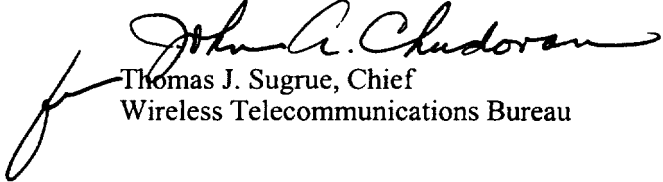
² See *Public Notice* Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification, DA 00-2099, CC Docket No. 94-102.

PRIVILEGED AND CONFIDENTIAL

WAustrie@fcc.gov. Parties who choose to file by paper must file an original and four copies of each filing with the Commission's Secretary, Magalie Roman Salas, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Washington, D.C. 20554 and a diskette copy to the Commission's copy contractor, International Transcription Service, Inc. (ITS), CY-B400, (202) 857-3800. In addition, parties must submit one copy to Wendy Austrie, Policy Division, Wireless Telecommunications Bureau, Federal Communications Commission, 445 12th Street, S.W., Washington, D.C. 20554. Reports will be available for public inspection during regular business hours in the FCC Public Reference Room, Room CY-A257, 445 12th Street, S.W., Washington, D.C. 20554.

6. Should you have any questions regarding this matter, please contact Ms. Wendy Austrie at 202-418-1310.

Federal Communications Commission



Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau

Centennial Puerto Rico Operations Corp. - Phase II E911 Report

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Background/Contact Information

NOV 9 2000

- (1) **Carrier Identifying Information:** Centennial Puerto Rico Operations Corp.
TRS No. 811030
- (2) **Contact Information:** Mr. Luis Carpena
Director
Wireline Engineering and Planning Dept.
Centennial de Puerto Rico
P.O. Box 71514
San Juan, PR 00936-8614
Tel.: 787-717-9902
PCS: 787-717-9010
Fax: 787-717-9998
e-mail: lcarpena@centennialpr.com

E911 Phase II Location Technology Information

- (1) **Type of Technology:** Centennial will adopt the hybrid solution proposed by Lucent Technologies (*FINDS Position Determination Equipment (PDE)*).
- (2) **Testing and Verification:** Centennial has not yet conducted any tests of Phase II technology. Centennial will advise the Commission of its plans to test and verify once they have been developed. According to Lucent, on Prototype trials performed under both stationary and driving scenarios on urban, suburban and rural environments, the FINDS PDE exceeded the FCC mandate. Lucent provided the following test results summary for the EFLT Suburban Field Test.:

Location accuracy obtained, with no change at all to the system, under normal T_add/T_drop = -13/-15db:

# BS Visible	% of Samples	% < 125 m	67 percentile	RMS Value	Method(s)	System requirements
3	53.0				FLT	Software at BS/MS needs to be enhanced to combine the information in PSMM and RTD wrt GPS time, and send it back to MSC.
2	32.4	35% overall	230 m overall	261 m overall	FLT+RTD	
1	14.6				RTD+FLAOA	

- (3) **Implementation Details and Schedule:** Centennial is currently examining the specific hardware and software changes that will be necessary and has not yet developed a schedule for such changes. Lucent has provided us with the following General Availability (GA) dates for the different phases of the E911 Phase II:

FINDS PDE 1.0 (GA 6/01)

Network Feature for FINDS: J-STD-036 CDMA interface to FINDS for locating E911 calls

FINDS PDE: Supports E911 Phase II Mandate for IS-801 mobiles

FINDS PDE 1.5 (GA 9/01)

Network Feature upgrade: Standards compliant to locate mobile-initiated non-E911 calls (standards dependent); Standards compliant to locate legacy mobiles (standards dependent)

FINDS PDE upgrade: Supports E911 Phase II Mandate for IS-801 mobiles; Supports mobile-initiated non-E911 location requests for both IS-801 mobiles and Legacy mobiles.

FINDS PDE 2.0 (GA 12/01)

Network Feature Upgrade: Standards compliant to locate network-initiated location requests (Standards dependent); Idle mode location (Standards dependent); Tracking (Standards dependent)

FINDS PDE upgrade: Supports E911 Phase II Mandate for IS-801 mobiles; Supports mobile-initiated non-E911 location requests for IS-801 mobiles and Legacy mobiles; Supports network-initiated mobile location requests, idle-mode location, and tracking.

- (4) **PSAP Interface:** Hardware and software changes will be necessary to interface with the PSAPs. However, Centennial does not yet have details of the existing PSAP facilities and is therefore unable to describe the extent of such changes. Centennial will incorporate the required industry standards in accordance with FCC requirements.
- (5) **Existing Handsets:** Centennial's plan for the replacement of customer handsets has not yet been developed since it will depend on the specific technology we ultimately adopt as well as other factors, including cost, associated with replacements.
- (6) **Location of Non-Compatible Handsets:** Centennial currently has over 100,000 handsets that are not ALI compatible and is currently considering the various factors associated with replacing and/or upgrading such handsets.
- (7) **Other Information:** Centennial has not received any requests from the 911 Services or the Puerto Rico Telecommunications Regulatory Board for implementation of Phase II of E911.